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Attorney for Liberty Bankers Life Insurance Company
and Winnfield Life Insurance Company, Secured Creditors

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§
	§
PRM DEVELOPMENT, LLC,	§ CASE NO. 10-35547-hdh-11
	§
ECONOMETRIC MANAGEMENT, INC.,	§ CASE NO. 10-35551-hdh-11
	§
HANS LOLLICK LAND COMPANY,	§ CASE NO. 10-36161-hdh-11
LLLP,	§
	§ CASE NO. 10-36159-hdh-11
LITTLE HANS LOLLIK HOLDINGS, LLP	§
	§ (Jointly Administered)
Debtors.	§
	§ HEARING DATE: April 20, 2011
	§ TIME: 2:00 P.M.

**SECURED CREDITORS' WITNESS AND EXHIBIT LIST FOR HEARING ON
CONFIRMATION OF COMPETING REORGANIZATION PLANS
[Relating to Docket Nos. 115 and 118]**

Liberty Bankers Life Insurance Company and Winnfield Life Insurance Company (collectively, "Secured Creditors") designate the following potential witnesses and exhibits for use during the hearings on confirmation of (a) Lender's Liquidating Joint Plan of Reorganization [Docket No. 115] and (b) Debtors' Amended Joint Plan of Reorganization [Docket No. 118] currently scheduled for April 20, 2011, at 2:00 p. m. Secured Creditors reserve the right to amend, modify, or supplement such designations as appropriate in accordance with the rules.

POTENTIAL WITNESSES

1. Brad Phillips
2. James C. Merrill, MAI
3. Peter R. Morris
4. Bruce R. Tizes
5. Richard Blumberg
6. Mike Meyer
7. Julie Linares
8. Kevin S. Wiley
9. Gerrit M. Pronske
10. Any witnesses designated by any of the Debtors or any other party in interest
11. Any rebuttal witnesses

POTENTIAL EXHIBITS

<u>Exhibit Designation</u>	<u>Description</u>
Ex 1	EMI's Bankruptcy Schedules [Docket No. 24] – by judicial notice
Ex 2	EMI's Statement of Financial Affairs [Docket No. 25] – by judicial notice
Ex 3	EMI's Amended Statement of Financial Affairs [Docket No. 35] – by judicial notice
Ex 4	Disclosure of Compensation of EMI Debtor's Attorney [Docket No. 26] – by judicial notice
Ex 5	List of EMI Equity Security Holders [Docket No. 27] – by judicial notice
Ex 6	EMI's Statement of Current Income [Docket No. 28] – by judicial notice
Ex 7	EMI's Application to Employ Linares Law Firm [Docket No. 40] – by judicial notice
Ex 8	Order Granting Relief From Automatic Stay Entered in Case No. 10-35551-sjg-11 (In re Econometric Management, Inc.) [Docket No. 45]
Ex 9	Transcript of EMI Stay Hearing [Docket No.] – By judicial notice

Ex 10	PRM's Bankruptcy Schedules [Docket No. 12] – by judicial notice
Ex 11	PRM's Statement of Financial Affairs [Docket No. 13] – by judicial notice
Ex 12	PRM's Amended Schedules [Docket No. 42] – by judicial notice
Ex 13	PRM's List of Equity Security Holders [Docket No. 15] – by judicial notice
Ex 14	PRM's Statement of Current Income [Docket No. 16] – by judicial notice
Ex 15	Bankruptcy Schedules and Statement of Financial Affairs filed by Little Hans Lollik Holdings, LLP in Case No. 10-36159-bjh-11 [Docket Nos. 15 and 16] – by judicial notice
Ex 16	Little Hans Lollik Holdings, LLP Statement of Current Income [Docket No. 18] – by judicial notice
Ex 17	Little Hans Application to Employ Pronske & Patel [Docket No. 21] – by judicial notice
Ex 18	Bankruptcy Schedules and Statement of Financial Affairs filed by Hans Lollick Land Company, Limited Liability Limited Partnership in Case No. 10-36161-bjh-11 [Docket Nos. 15 and 16] – by judicial notice
Ex 19	Hans Lollick Land Company Statement of Current Income [Docket No. 18] – by judicial notice
Ex 20	Hans Lollick Land Company Application to Employ Pronske & Patel [Docket No. 21] – by judicial notice
Ex 21	Debtors' Monthly Operating Reports – by judicial notice
Ex 22	Lender's Liquidating Plan of Reorganization for EMI and PRM [Docket No. 115] – by judicial notice
Ex 23	Secured Creditors' Acceptance of Lender's Liquidating Plan of Reorganization for EMI and PRM [Docket No. 132] – by judicial notice
Ex 24	Claims Registers in EMI, PRM, Big Hans, and Little Hans Cases – by judicial notice
	Demonstrative Charts, Summaries, and Illustrations
	Any exhibits designated by any of the Debtors or any other party in interest
	Any exhibits used for rebuttal or impeachment

Dated: April 15, 2011

Respectfully submitted,

/s/ John P. Lewis, Jr.

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Attorney for Liberty Bankers Life Insurance
Company and Winnfield Life Insurance Company

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Witness & Exhibit List was served upon by electronic noticing and email transmission on April 15, 2011, upon (a) the Office of the United States Trustee, 9th Floor, U.S. Courthouse and Federal Building, 1100 Commerce Street, Texas 75242, (b) Julie Ann Linares, Esq., 2911 Turtle Creek Blvd., Suite 300, Dallas, Texas 75219, and Kevin S. Wiley, Jr., Attorneys for Econometric Management, Inc., and (c) Gerrit M. Pronske, Esq., Pronske & Patel, P.C., Suite 5350, 2200 Ross Avenue, Dallas, Texas 75201, Attorneys for PRM Development, LLC, Hans Lollick Land Company, LLLP, and Little Hans Lollick Holdings, LLP.

/s/ John P. Lewis, Jr.